

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Kemp Carter

) Chapter 13

) Bankruptcy No. 23-10041

Debtor(s))

**MOTION TO EXPEDITED HEARING ON MOTION TO VACATE DISMISSAL ORDER AND
REINSTATE CASE**

Debtor Kemp Carter, by his counsel, Sharon S. Masters, Esquire, hereby moves this Honorable Court for an expedited hearing on the Motion to Vacate Dismissal Order and Reinstatement Case, and in support thereof avers as follows:

1. The debtor(s) filed this Chapter 13 bankruptcy petition on January 8, 2023.
2. Debtor's case was dismissed with prejudice on June 28, 2023 for failure to make plan payments.
3. Debtor could not make plan payments due to a loss of income. He can now make plan payments and has the funds to become current with the trustee.
4. A sheriff's sale is scheduled for December 5, 2023; the standard hearing on Motion to Vacate Dismissal Order is December 6, 2023.
5. Debtor will be severely prejudiced by sale of his property; he has been approved for PAHAF funds to reinstate his mortgage loan.
6. An expedited hearing is necessary because Debtor will be prejudiced by not having bankruptcy protection for the time until the motion hearing.

WHEREFORE, Debtor respectfully requests the Court grant an expedited hearing on the Motion to Vacate Dismissal Order and reinstate the Chapter 13 case.

Dated: 11/6/2023

/s/ Sharon S. Masters, Esq.
Sharon S. Masters, Esq.
Attorney for Debtor